

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

SUSAN JANE HOGARTH,

Plaintiff,

v.

KAREN BRINSON BELL, et al.,

Defendants.

Case No.: 5:24-cv-00481-LF

Hon. Louise W. Flanagan

**PLAINTIFF'S CONSENTED-TO AND
UNOPPOSED MOTION FOR LEAVE
TO FILE VERIFIED SUPPLEMENTAL
COMPLAINT**

In accordance with Federal Rule of Civil Procedure 15(d), Plaintiff Susan Hogarth requests leave to file a verified supplemental complaint, attached here as **Exhibit A**, describing events that occurred after Hogarth filed her Verified Complaint. (See ECF No. 1.) The State Board Defendants, Attorney General Stein, and District Attorney Freeman consent to this motion, while the Wake County Board Defendants do not oppose.¹ For the reasons stated in Hogarth's Local Rule 7.1(e) memorandum in support (ECF No. 63), the Court should grant her motion.

Dated: November 5, 2024

Respectfully Submitted,

/s/ James M. Dedman IV

James M. Dedman IV*

(NC Bar # 37415)

Gallivan White & Boyd P.A.

6805 Carnegie Blvd, Ste. 200

Charlotte, NC, 28211

(704)-552-1712

jdeman@gwblawfirm.com

Eric Spengler*

/s/ Jeffrey D. Zeman

JEFFREY D. ZEMAN**

(Pa. Bar No. 328570)

DANIEL M. ORTNER**

(Ca. Bar No. 329866)

James M. Diaz**

(Vt. Bar. No. 5014)

FOUNDATION FOR INDIVIDUAL

RIGHTS AND EXPRESSION

510 Walnut St., Ste. 900

¹ Pursuant to Local Rule 7.1, on November 2, 2024, Plaintiff's counsel sought Defendants' consent for this motion via email. All Defendants responded.

(NC Bar # 47165)
SPENGLER + AGANS PLLC
352 N. Caswell Rd.
Charlotte, NC 28204
(704) 999-8733
eric@sab.law

Philadelphia, PA 19106
(215) 717-3473
jeff.zeman@thefire.org
daniel.ortner@thefire.org
jay.diaz@thefire.org

**Special Appearance Pursuant to
Local Rule 83.1(e)

*Local Civil Rule 83.1(d) Attorney

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2024, a true and correct copy of the foregoing document was transmitted via using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Jeffrey D. Zeman
JEFFREY D. ZEMAN
FOUNDATION FOR INDIVIDUAL
RIGHTS AND EXPRESSION